

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA**

IN RE: : Bankruptcy No. 15-23639-GLT
EDWARD J. ROCHE :
KATHLEEN J. ROCHE : Chapter 7
Debtor : Related to Doc. No. 181
U.S. Bank Trust National Association, as :
Trustee of Bungalow Series F Trust :
Movant :
v. :
Edward J. Roche, :
Kathleen J. Roche :
Debtor(s) :
Natalie Lutz Cardiello, Esquire :
Respondent(s) :

Trustee's Response to

**Motion of U.S. Bank Trust National Association, as Trustee of Bungalow
Series F Trust For Relief from the Automatic Stay under 11 U.S.C. §362(d)
with Respect to Property: 5632 Fairfield Drive, Gibsonia, PA 15044**

AND NOW comes Natalie Lutz Cardiello, Trustee, by and through her attorney, Natalie Lutz Cardiello, Esquire, and files the Motion of U.S. Bank Trust National Association, as Trustee of Bungalow Series F Trust For Relief from the Automatic Stay under 11 U.S.C. §362(d) with Respect to Property: 5632 Fairfield Drive, Gibsonia, PA 15044 (the “Motion”) filed in the above matter.

1. The Debtor filed a Voluntary Petition under Chapter 13 of the Bankruptcy Code on October 2, 2015, which case was converted to a case under Chapter 7 on March 18, 2016.
2. Natalie Lutz Cardiello was duly appointed Trustee and has been so serving.
3. The Motion was filed in connection with the Debtor’s property located at 5632 Fairfield Drive, Gibsonia, PA 15044 (the “Property”).
4. The Trustee has recently been working with BK Global in an effort to negotiate carve out arrangements with lenders for the benefit of the Bankruptcy Estate. Although the Trustee previously filed a Report of No Distribution, she now believes that the Property can be sold to benefit the estate and its creditors.

5. The Trustee does not object to the relief requested by Movant, but requests a reasonable period of time of six months to market and sell the Property.

WHEREFORE, the Trustee requests that this Honorable Court enter an Order granting the U.S. Bank Trust National Association, as Trustee of Bungalow Series F Trust For Relief from the Automatic Stay under 11 U.S.C. §362(d) with Respect to Property: 5632 Fairfield Drive, Gibsonia, PA 15044, effective as of June 30, 2018.

Dated: December 5, 2017

Respectfully submitted,

/s/ Natalie Lutz Cardiello
Natalie Lutz Cardiello, Esquire
PA ID# 51296
107 Huron Drive
Carnegie, PA 15106
ncardiello@comcast.net
(412) 276-4043